



Sprint Nextel
2001 Edmund Halley Drive
Reston, VA 20191

September 15, 2010

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W. Room TW-A325
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation

WT Docket No. 10-112 – Notice of Proposed Rulemaking and Order

Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95 and 101 To Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules and Policies for Certain Wireless Radio Services

Imposition of a Freeze on the Filing of Competing Renewal Applications for Certain Wireless Radio Services and the Processing of Already-Filed Competing Renewal Applications

Dear Ms. Dortch:

On Wednesday, September 15, 2010, Robin Cohen and Robert McNamara of Sprint Nextel Corporation (“Sprint Nextel”) met with Kathy Harris, Richard Arsenault, and Michael Connelly of the Mobility Division, and John Schauble of the Broadband Division of the Wireless Telecommunications Bureau regarding the above-captioned proceeding.

Relying on its Comments submitted in the record of the above-captioned proceeding Sprint Nextel noted that although it generally supports harmonizing the rules applicable to like Wireless Services, the proposed geographic area license renewal rules would impose a severe administrative burdens on licensees such as Sprint Nextel which has thousands of overlapping BTA, EA, MTA and MEA licenses. Much of the information proposed to be collected relates to networks rather than individual licenses and includes proprietary, commercially sensitive information not routinely available to the public. The lack of clearly defined standards and/or safe harbors for evaluation of renewals would result in uncertainty and discourage rather than encourage innovation and investment in new facilities and services, contrary to the Commission’s stated objectives. Sprint Nextel recommended establishing safe harbors for satisfying renewal requirements and permitting licensees that meet the specified criteria to so certify, similar to the proposed streamlined renewal procedure proposed for site-based licensees. Sprint Nextel also suggested simplifying the proposed regulatory compliance demonstration by permitting cites to orders finding a violation rather filing copies with each renewal application, and narrowing the definition of affiliates to those entities under common control and management.

Sprint Nextel reiterated its support of the proposed delay in applying new renewal requirements to incumbent BRS and EBS licensees until 2016 given the complexities of the transition of the 2500-2690 MHz band, and the necessity to provide similar relief to Part 90 ESMR licensees until 2012 due to the even greater complexity involved in the transition of thousands of licensees, including public safety licensees in the 800 MHz band.

Additionally, Sprint Nextel noted its support for the proposal to adopt a uniform framework for permanent discontinuance of operation rules, as well as the proposal to require each party to the geographic partitioning or spectrum disaggregation of a geographic area license to independently satisfy the service specific construction requirements, provided that the new rules are applied prospectively to parties seeking to partition and or disaggregate geographic area licenses. Further, Sprint Nextel recommended that licensees that acquire previously partitioned and/or disaggregated licenses be permitted to consolidate the subdivided parts into the original license configuration. This option would promote clarity and simplification of the license database while reducing administrative burdens consistent with the public interest goals of the subject proceeding.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed electronically in the above-captioned docket and electronic copies are being submitted to the Commission staff listed below. If you have any questions regarding this matter, please contact the undersigned at (703) 433-4222.

Sincerely,

/s/ R.H. McNamara

Robert H. McNamara
Director, Spectrum Management
Sprint Nextel Corporation

cc: Kathy Harris
Richard Arsenault
Michael Connelly
John Schauble